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July 17, 2003

Via US Mail and e-mail

Ms. Marianne Lamont Horinko, Acting Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel
HPV Chemical Challenge Program Submission
Revised Benzothiazole-based Thiazoles Category
Revised Category Justification and Testing Rationale**

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Dear Ms. Horinko:

The RAPA Panel of the American Chemistry Council is pleased to submit a *Revised Category Justification and Testing Rationale* and supporting robust summary documents as partial revision of the documentation for the Benzothiazole-based Thiazoles category. The revised category definition covers three of the 37 chemicals RAPA is voluntarily sponsoring in the HPV Chemical Challenge Program. The RAPA Panel includes the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

In this submission, please find the *Category Justification and Testing Rationale* for the revised *Benzothiazole-based Thiazoles* category. Three chemicals in the category are sponsored in the Program, as listed in the following table:

RAPA Panel Revised Benzothiazole-based Thiozole Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
149-30-4	2(3H)-Benzothiazolethione
155-04-4	2(3H)-Benzothiazolethione, zinc salt
2492-26-4	2(3H)-Benzothiazolethione, sodium salt



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Data for an additional chemical in the category, listed in the table below, are used to support the conclusions reached for the category.

RAPA Panel Revised Benzothiazole-based Thiozole Category Additional Chemicals in the Category	
CAS Number	Compound Name
95-16-9	Benzothiozole

The documents submitted in support of the category (dated November 30, 2001), as originally conceived, included data for 2-(4-morpholinylidithio)-benzothiazole (CAS number 95-32-9). Comments received from EPA dated September 6, 2002 questioned whether the data supported extrapolation across the category. Accordingly, revised test plans and robust summaries for the four sponsored chemicals that were formerly included in the *Benzothiazole-based Thiazoles* category will be resubmitted to include three chemicals in the revised *Benzothiazole-based Thiazoles* category and the fourth chemical in separate documents describing the *Benzothiazole and Morpholine-based Thiazole* category.

In addition to the revised *Category Justification and Testing Rationale*, please also find attached revised robust summaries for each of the three sponsored chemicals and the supporting chemical in the revised *Benzothiazole-based Thiazoles* category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments